

# EXHIBIT 17

PUBLIC REDACTED VERSION

(PREVIOUSLY FILED UNDER SEAL AT ECF 182-17)

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UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

In Re: )  
 )  
 ) No. 2:21-cv-00563-JCC  
VALVE ANTITRUST LITIGATION )  
 )

**VIDEO-RECORDED DEPOSITION UPON ORAL EXAMINATION OF**  
**THOMAS GIARDINO**

\*\*\* HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY \*\*\*

9:04 A.M.

THURSDAY, NOVEMBER 2, 2023

701 FIFTH AVENUE, SUITE 5100

## **SEATTLE, WASHINGTON**

Reported by: Tami Lynn Vondran, CRR, RMR, CCR/CSR

WA CCR #2157; OR CSR #20-0477; CA CSR #14435

Job Number 6276475



A vertical column of 20 black horizontal bars of varying lengths, with small black squares at the start of some bars.

24 Q. All right. So then Mr. Peterson, who had been  
25 cc'd here, he responds just to you and says, "I want to

1 frame this and hang it on our cabal wall."

2 Those are his words; right?

3 A. Yes.

4 Q. And a cabal there is a small group -- as used  
5 by Mr. Peterson, it's a small group at Valve; is that  
6 right?

7 A. Yeah. I -- that term predates me at Valve. I  
8 think "cabal" historically at Valve was shorthand for a  
9 team or a product group. And so that's my  
10 interpretation of how he uses it here as well.

11 Q. Okay. And he basically -- and so you and he  
12 were part of the same cabal in this timeframe, 2019?

13 A. Yes. Erik and I worked on the same team, and  
14 at this time we would have sat near each other in the  
15 building as well.

16 Q. So he's basically saying, I want to frame this  
17 and hang it near where we sit?

18 A. You'd have to ask him exactly what he meant,  
19 but I can just read his words from the email.

20 Q. All right. Well, you responded and you said,  
21 "gonna get it tattooed on my back like it's the  
22 Declaration of Independence."

23 Those were your words?

24 A. Yes.

25 Q. I assume you never got that tattoo?

1 A. I do not have any tattoos.

Q. All right. But here, why did you say that?

3           A.     Well, I don't recall this email conversation,  
4 and I don't recall my specific state of mind when  
5 replying.

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